

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CATHY CARTER,

Plaintiff,

v.

PAUL HOWARD,
in his Individual Capacity

Defendant.

Civil Action No.
1:20-cv-01674-TWT-JSA

DECLARATION OF CATHY CARTER UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746

1.

I, **Cathy Carter**, a Georgia citizen, declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct:

2.

My name is Cathy Carter, and I am older than 18 years of age, and I am sui juris and prepared to offer testimony in this case.

3.

On this 10th day of December 2022, I make this **DECLARATION** based upon my personal knowledge of its contents, and to the best of my knowledge everything contained in this **DECLARATION** is true and correct.

4.

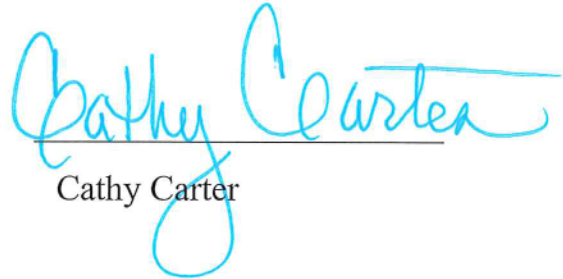
I wanted to ensure the Court fully understands that my testimony with respect to Mr. Howard helping me resolve my arrest on January 3, 2019, an arrest that occurred because of a change in policy of which I was not aware, a zero-tolerance policy. I testified that in late 2018 and in 2019 that I “stopped completely taking his calls or anything” and that during this time period he still tried to have sex with me. (See 148:2-15.) By my statement “not that he didn’t try” I mean to include the fact that without question Howard began asking me for sex within days of helping me resolve that gun situation on January 3, 2019, quickly. I rejected his advances and point the Court to my other deposition testimony, inter alia, 141:6-15, 147:21-149:06, 205:12-23, to support this statement.

5.

I also want to ensure that the Court clearly knows that during my probationary period, which began in mid-April 2019, Howard would call me and make sexual remarks and ask that I have sex with him or at least have phone sex. I rejected him each time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of December 2022.


Cathy Carter